

Exhibit 6

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

against

RUBEN WEIGAND, and
HAMID AKHAVAN a/k/a “Ray
Akhavan”,

Defendants.

No. 20-CR-188 (JSR)

DECLARATION OF PATRICK PHANCAO

DECLARATION OF PATRICK PHANCAO

I, Patrick Phanco, declare as follows:

1. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. I, have been a licensed attorney in California since 2001. My practice focuses primarily on estate and tax planning.

3. I have represented Mr. Hamid Akhavan for approximately seven (7) years.

4. As part of that representation, Mr. Akhavan engaged me to provide estate and tax planning services.

5. On or about February 2018, Mr. Akhavan and his family began to consider more advanced estate planning structures in an effort to plan for and guard against any harm that might arise from Mr. Akhavan’s struggles with substance abuse.

6. One aspect of the plan involved the creation of a Cook Islands Trust (the “Trust”). The trust was designed to protect the family, to the extent possible, from potential creditors and Mr. Akhavan’s self-destructive behavior, including spending beyond his means.

7. The Trust was intended to provide a more secure fund to ensure Mr. Akhavan’s family would be able to maintain a certain standard of living in the event his mental or physical health deteriorated.

8. Unfortunately, in the months and years following the creation of the Trust, Mr. Akhavan's spending outstripped his income, and funds were never allocated to the Trust. As a result, although the Trust was created, it was never funded.

9. Once an offshore trust is created, whether or not it is funded, it must file an annual tax return with the IRS. In this case, the trust was created, and the required tax returns have been filed annually in accordance with applicable law, though the Trust does not, and has never, held any funds.

10. An additional hurdle to funding the Trust has been the refusal of any bank to open an account in the name of the Trust, based on its association with Mr. Akhavan. This has been a problem for Mr. Akhavan's personal banking, as well as for the Trust. From 2018 to 2020, I approached over half a dozen banking institutions, all of whom declined to open a banking account for Mr. Akhavan or the Trust.

11. To my knowledge, Mr. Akhavan does not have any offshore accounts or access to any offshore funds.

I declare that the foregoing is true and correct.

Executed on this 2th day of June, 2021, at Los Angeles, California



Patrick Phanco